

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>JAMES JENKINS,</b>	)	
<b>individually and on behalf of all</b>	)	
<b>others similarly situated,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. 3:14-cv-00758 (HEH)</b>
	)	
<b>REALPAGE, INC.,</b>	)	
	)	
<b>Defendant.</b>	)	

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**JOINT MOTION TO ENTER STIPULATED PROTECTIVE ORDER**

Plaintiff, James Jenkins, individually and on behalf of all others similarly situated, and Defendant, RealPage, Inc., through their respective attorneys of record, pursuant to Fed. R. Civ. P. 26(c), for their Joint Motion to Enter Stipulated Protective Order, state as follows:

1. Counsel for the parties agree that a stipulated protective order should be entered in this case as certain information to be exchanged in discovery is or may constitute confidential, proprietary and/or business information.
2. Entry of an appropriate protective order will facilitate document disclosure and production in this case, while protecting the parties' confidential, proprietary and/or business information.
3. Good cause exists for the entry of the Stipulated Protective Order.
4. Therefore, the parties submit for the Court's consideration the proposed Stipulated Protective Order attached hereto as **Exhibit 1**.
5. As evidenced by the electronic signatures of counsel on this Joint Motion, counsel for the parties consent to the entry of the attached Stipulated Protective Order.

6. Counsel for the parties are circulating the proposed Stipulated Protective Order for endorsement and will submit a fully endorsed original of the Order to the Court shortly for entry.

WHEREFORE, Plaintiff, James Jenkins, individually and on behalf of all others similarly situated, and Defendant, RealPage, Inc., by counsel, respectfully requests that the Court: (1) grant their Joint Motion to Enter Stipulated Protective Order; (2) enter the proposed Stipulated Protective Order attached hereto as Exhibit 1 when the fully endorsed original is submitted to the Court; and (3) award such further relief as the Court deems appropriate.

**JAMES JENKINS, individually and on behalf of all others similarly situated**

**REALPAGE, INC.**

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